

# Inspections

## Compliance Inspections

Each Inspector will be responsible for inspecting operating tank systems to ensure compliance with applicable regulations. These instructions provide a standard operating procedure (SOP) for conducting this type of inspection.

### Pre-Inspection Guidelines

- Step 1: Select the site. You may choose sites based upon either the amount of time elapsed since the last inspection or by geographic location;
- Step 2: Research the database. You should print the site and tank information so that you can take it to the site during the inspection;
- Step 3: Contact the owner or operator seven to ten days prior to the inspection and make an appointment to visit. Request that the last 12 months of leak detection and testing records be available on site at the time of your visit. Also, you should ask that any keys needed to open dispensers and fill caps be available at the time of the inspection. Obtain directions to the facility if necessary;
- Step 4: Complete the Pre-Inspection Checklist. Remember to include the name of the person you spoke to when making the appointment.

### Facility Inspection

- Step 1: Survey the area when arriving at the facility. Note the location of the tanks, vent pipes, and dispensers. Think safety. Look for any conditions that may pose a hazard or threat;
- Step 2: Enter the premises, introduce yourself, ask for the person you are supposed to meet (if appropriate) and explain the purpose of your visit. You should verify the facility name, owner (if the owner is different than that listed on the database, you will need to notify your UST Compliance Coordinator), operator name and address (if applicable), supplier name and address, and contact person. (Note: Your inspector badge is to be worn so that it is visible at all times during the inspection.) Request that the owner/operator have the leak detection and system testing records available when you finish your equipment inspection and return to discuss your findings.

As you enter the premises, look for the registration certificate. When you locate it, verify that you are at the right facility and that the certificate is

for the current fiscal year. If you cannot locate it, inform the owner/operator that failure to properly display the certificate is a violation of the regulation and ask him to locate and post it as soon as possible;

If you discover an unregistered site, inform the owner/operator of the registration requirements and provide a registration form. Failure to register a site is a violation listed in PART ONE of the Notice of Violation form. These violations are discussed later in this section. When inspecting an unregistered site, examine any product delivery records carefully. Record the date of the last delivery and the name and address of the supplier on the inspection form. Supplier information may not always be available;

### **Equipment Inspection**

- Step 1: Verify the number of tanks on site and check this against the number registered with the Department. Remember to count the number of vent pipes. A greater number of vent pipes than registered tanks frequently indicates unregistered tanks. This will not always be the case, as tanks may be removed leaving the vent pipe in place. You should count the number of fill spouts. Except in cases where a tank is compartmented (or rare cases where the fill pipes are manifolded), the number of fill spouts will equal the number of tanks. Remember to examine the entire area. Other tanks, frequently waste oil and kerosene tanks, may be in a separate location;
- Step 2: Determine the type of pumping system (pressure or suction) and note it on the inspection checklist. One sure method for doing this is to remove the skirt from the bottom of the dispenser;

### **Suction Systems**

If you see a drive motor with belts and pulleys attached, the system is suction. If you determine that the system is suction, you should attempt to locate a vertical check valve. The valve closely resembles a standard piping union, so a visual determination may not be possible. The owner should have documentation in his tank construction records showing the location of the check valve and these records can be reviewed at the time of the inspection. If you are able to locate the check valve, note the location on the inspection checklist. If you are unable to determine the location of the check valve, assume that the system is an American system and, therefore, will require periodic tightness testing. Look for the presence of leaks or stained soils under the dispenser. Note the conditions and replace the skirt;

### **Pressure Systems**

If you see an arrangement of pipes and a metering device (no belts or pulleys), the system is pressurized. Look for the presence of leaks and stained soils. Note the conditions and replace the dispenser skirt. The pump head for pressurized systems is usually, though not always, covered by a manway located above the tank;

Step 3: Remove the manway cover above the submerged pump (if so equipped). If you are dealing with a pressurized system, the pump cover will typically be the largest access cover. The pump manway will frequently be filled with soil. If this is the case, either you or a facility representative must remove enough of the soil to view the pump head. Note the general condition of the pump, the presence of a containment basin, signs of contamination, and especially, the presence (or absence) of a line leak detector. Replace the manway cover before moving on. Suction systems will not typically have large manways above the tank. You will occasionally encounter a manway that is so tightly wedged in or so heavy that you cannot open it. You should attempt to get help from the owner/operator or from facility personnel. If no one is available to help you, note on the checklist and NOV that you were unable to view the equipment for tank X. Complete the inspection and NOV for any deficiencies that you find on the rest of the site. You will then have to contact the owner/operator and arrange to have the cover removed so that you can view the equipment underneath. As you can see, this will require a lot of extra work. Make every effort to remove manways during the initial inspection.

Step 4: Remove the smaller access covers one at a time. You will typically find one to three access covers per tank. Except in rare instances, there will be a fill spout. This will often be a four inch diameter pipe extending down to the tank and should be secured by a locking cap. Older tanks may have a two or three inch fill pipe that may be secured by a screw-on cap. Note on the inspection checklist the presence of spill catchment basins. Remove the fill cap (use an intrinsically safe flashlight or a mirror to provide light) and look down the fill pipe. Note the presence of drop tubes and drop tube shut-off valves. If you are looking at a TOS tank, look for product in the tank and, if present, note on the inspection checklist how many inches remain. If you wish to test the effectiveness of a corrosion protection system, you may do so at this time. Other access covers may contain tank gauge probes, extractor fittings for ball float shut-off valves, or Stage 1 vapor recovery connections. Note the presence of these, if encountered. It is important that you look in all of the small access covers, even though they do not typically contain items of interest to us. A broken top on an ATG probe or a loose cap on a stub-out may cause the

overfill equipment to fail (this has happened several times). Make sure that you replace all caps, access covers, manways, and dispenser skirts;

- Step 5: If the tank system is equipped with an impressed current cathodic protection system, locate the rectifier box and check to make sure the system is operating. Note the results on the inspection checklist;
- Step 6: Locate the gauge stick, if applicable. Note the condition of the stick on the inspection checklist: Can you read it to the nearest 1/8 inch? Is the button on the bottom in place? Is the stick broken or cut-off? If the stick is in poor condition, you will need to tell the owner/operator that it must be replaced;
- Step 7: Return inside and examine the tank gauge, if applicable. There are many brands and models on the market and more are being introduced regularly, so you are not expected to know how to operate them all. Over time, however, you will become familiar with many of the more popular models. If you encounter a model that you are not familiar with, **do not experiment**. You may inadvertently interfere with its operation. If you wish to learn more about the unit, obtain an operators manual and study it before attempting operation. If you are familiar with the model, you may wish to view a leak test report;

### **Discussions with the Owner/Operator**

- Step 1: Return to the owner/operator and request the leak detection and system testing records. Examine these records carefully and determine if the owner/operator is keeping the proper records for the type of leak detection he is performing. If the owner/operator is attempting to keep good records, inform him of any changes that may improve his system. If the owner/operator has not kept records or is not performing leak detection, inform him that he is in violation of the regulations and instruct him on proper leak detection.

Another document that you must review at the facility is the financial responsibility (FR) form. The supporting documentation can be stored at an off-site location, but the FR form must be at the facility at all times. When you are scheduling the inspection, look at the F screen on the database. You will be able to determine if the proper FR documentation has been supplied to the central office. Failure to provide FR information to the Division is a violation of Section 280.93(a) of the SCUSTCR, but the NOV for this particular violation is issued from the Central Office. When you are conducting the inspection, ask to see the FR form. Failure to have the form on site is a violation of Section 280.101(d) for the

SCUSTCR and should be referenced on the NOV issued during the inspection.

Step 2: Complete the appropriate letter (NOV, In-Compliance, or Warning Notice) and have the owner/operator or his representative sign it, if needed. You will occasionally encounter an owner/operator that will refuse to sign the NOV. In this case, note this at the bottom of the NOV and forward it to the central office. If a representative of the owner/operator receives the NOV, then you must also mail the Inspection Notice postcard to the owner after the inspection. Separate the copies, leave the original with the owner/operator and keep the carbon copy to be forwarded to the central office along with the inspection checklist.

### **Notice of Violation**

When informing an owner/operator of a violation, you must reference the section of the SCUSTCR in question and describe the violation. The Notice of Violation form has several of the most serious violations already referenced and described in PART ONE. Less serious violations should be listed in the spaces provided in PART TWO.

PART ONE: The most serious violations are included in this part. Because these violations could disqualify an owner from the SUPERB fund, they result in an immediate referral to the Enforcement Section. These serious violations are:

280.20/.21 - Failure to equip a permitted system with spill, overfill, and corrosion protection;  
280.41 - Failure to equip a pressurized line with an automatic line leak detector;  
280.61 - Failure to report a release;  
280.62 - Failure to abate a confirmed release  
280.10 - Introduction of petroleum into an UST which is not properly registered;

For PART ONE violations, mark the appropriate space on the NOV form and inform the owner/operator that the situation is being referred to the enforcement section for appropriate action. The NOV form states that the situation must be corrected immediately. When doing your TASK entry for these violations, set a compliance due-date of 45 days from the date of the Notice of Violation. The central office staff will use this date to track compliance

PART TWO: Any violations that do not fall under PART ONE are included under PART TWO. The violations included in this part are

considered less serious than the violations in PART ONE. If you discover a PART TWO violation, reference the appropriate section of the regulation and describe the violation on the NOV form, tell the owner/operator of violation of the regulations and, if the situation is not corrected by the compliance due-date, the situation may be referred to the enforcement section. PART TWO compliance due-dates will usually be set at 45 days from the date of the inspection;

PART THREE: Any comments that you have should be listed in PART THREE. Short explanations of PART ONE and TWO violations, tips on bringing the site into compliance, and other problems you note that are not violations are good things to include here;

### **How To Get In Compliance**

This checklist provides a convenient written reminder to the owner/operator of the things required to bring the site into compliance. Fill in the appropriate information and provide a copy to the owner/operator. When establishing a due-date for TOU tank abandonment, allow sixty days from the date of the compliance inspection.